

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:)	
)	Chapter 11
)	
CAESARS ENTERTAINMENT OPERATING COMPANY, INC., <u>et al.</u> , ¹)	Case No. 15-01145 (ABG)
)	
Reorganized Debtors.)	(Jointly Administered)
)	Re: Docket No. 8167

**REORGANIZED DEBTORS' LIMITED OBJECTION AND
RESERVATION OF RIGHTS TO MOTION FOR MODIFICATION OF INJUNCTION**

The above-captioned reorganized debtors (collectively before the effective date of their plan of reorganization, the “Debtors,” and after the effective date of their plan of reorganization, the “Reorganized Debtors”) file this limited objection (this “Objection”) to the *Motion to Modify the Discharge Injunction* [Docket No. 8167] (the “Motion”) filed by plaintiff Lawrence Culp (the “Movant”). In support of this Objection, the Reorganized Debtors respectfully state as follows.

Objection

1. The Movant did not file a proof of claim in these chapter 11 cases and therefore has no right to recover from the Debtors’ estates. See generally In re J.S. II, L.L.C., 389 B.R. 563, 566 (Bankr. N.D. Ill. 2008) (noting that a creditor must timely file a proof of claim to recover from a debtor). Because the Movant does not have a right to recover from the Debtors’ estates, the Reorganized Debtors have been investigating whether insurance and/or any applicable indemnification agreement would fully cover the costs should the litigation continue.

2. Although the Reorganized Debtors hope to reach a consensual resolution of the Motion, as of the date hereof the Reorganized Debtors have not yet confirmed that no costs

¹ A complete list of the Reorganized Debtors and the last four digits of their federal tax identification numbers may be obtained at <https://cases.primeclerk.com/CEOC>.

would be required of the Debtors' estates if the litigation were to resume. As such, the Reorganized Debtors request that the Motion be continued to allow further time to investigate this matter and negotiate a consensual resolution. If the parties are unable to reach a consensual resolution of the Motion, the Reorganized Debtors will request the Court to set a briefing schedule at a later date so that the Reorganized Debtors may address the merits of the Movant's request to modify the injunction rising under Article VIII.E of the *Debtors' Third Amended Joint Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 6318] and section 524(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532.

Respectfully,

Dated: August 8, 2018
Chicago, Illinois

/s/ David R. Seligman, P.C.

James H.M. Sprayregen, P.C.

David R. Seligman, P.C.

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

300 North LaSalle

Chicago, Illinois 60654

Telephone: (312) 862-2000

Facsimile: (312) 862-2200

- and -

Nicole L. Greenblatt, P.C.

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

601 Lexington Avenue

New York, New York 10022-4611

Telephone: (212) 446-4800

Facsimile: (212) 446-4900

Counsel to the Reorganized Debtors